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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC

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SEPTEMBER 8, 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

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CC Docket No. 92-105

Revised Public Notice on)

FCC Convenes a Public Forum on 7-1-1 Access to)

Telecommunications Relay Services)

EXPARTE COMMENTS
OF THE
Maryland Department of Budget & Management

I. The Maryland Relay Format – 7-1-1

Good Afternoon, my name is Gil Becker, I am with the Maryland Department of Budget and Management. I am responsible for administration of the Maryland Relay, the fifth busiest Telecommunications Relay Service (TRS) in the country. The State of Maryland implemented 7-1-1 abbreviated dialing access to TRS in February of 1999. First, I would like to say how pleased we are with the success of 7-1-1 access to TRS. Customer acceptance has been much greater than expected and we couldn't be happier. I am not saying the system we have in place is perfect, because we have a few issues to iron out, but overall, 7-1-1 addressed several outstanding concerns and it truly brings relay one step closer to functional equivalency.

Prior to the implementation of 7-1-1, Maryland had one primary number (1-800-735-2258) which handled 99% of all calls to the Maryland Relay. This number served all incoming communication modes: Voice, TTY, VCO, and ASCII. Two more numbers were established as additional services were added to the relay product line for the citizens of Maryland. One number was added to handle Speech-to-Speech Relay and the other to allow relay users to access 900 pay-per-call services and be billed directly for those calls.

Having one primary number to access Maryland Relay had many benefits, however there were some drawbacks. The system worked well except for those calls originating from a PBX. The existing system had what is known as a "Customer Profile", also known as "Branding" or a database record attached to the ANI (originating number). The system remembers the last communication mode used to call into the relay. Voice callers dialing the relay from a PBX were often frustrated by having to listen to two series of high-pitched tones if a TTY or computer was the last call handled by that PBX trunk. This was one of the most common complaints received by our office. It was necessary to explain to the voice caller the PBX issue and ask them to call the relay again. They were instructed that if they get tones, to wait through two series of tones (TTY, then ASCII) for an operator to answer in voice.

A similar situation occurred when accessing relay in households with persons using multi-modes of communication. For example, if a TTY user in a household was the last person to call the

relay, then the next user in that same household would get TTY tones, whether they were a voice or a TTY user.

Two common complaints heard among TTY users are failure to get a call back when they leave a message for someone unfamiliar with the relay, and hang-ups when calling businesses through the Relay. Often new relay users are intimidated or confused when they receive a message to call the relay using an eleven-digit number and then to give an operator another ten-digit number to dial. Others simply hang-up when Maryland Relay calls, thinking it is some sort of telemarketer. One of the primary goals of our outreach effort in promoting 7-1-1 was to increase the public's awareness of the availability of relay service. Hopefully, the increased general awareness would decrease hang-ups and encourage callbacks. A three-digit number not only highlights the importance of the service, but makes it easier to remember, and more effective as a marketing tool.

Bell Atlantic can explain the technical issues of how they set up abbreviated dialing, but basically, when a caller dials 7-1-1 that call arrives at the Central Office and it is directed toward an alternate toll free number, which in turn is sent to the relay. This conversion does seem to add a few seconds to the time it takes for the call to arrive at the relay center. The time that it takes a live operator to receive a call at their station is referred to as "Average Speed of Answer" and these times have remained consistent at 2.9 to 3.0 seconds since the implementation of 7-1-1.

Calls directed to the 800 number assigned to 7-1-1 are handled differently than other calls coming into the relay. These calls are always answered in the voice mode first and there is no database look-up. This solved the problem I referred to earlier associated with PBX systems by ignoring the last incoming mode of communication to the relay and eliminating the annoying tones to the voice caller. Unfortunately, this setup solved one problem but created another, since the call is answered in voice first and "Branding" or "Customer Profile" is ignored, TTY, VCO, and ASCII users must wait for the operator to answer in voice, then TTY, and finally ASCII. In addition, VCO users must always identify themselves as a VCO user since branding is ignored.

To address the issue of longer answer detect times for VCO and ASCII, separate dedicated toll-free numbers for these two access modes will be implemented during the first quarter of 2000. Until this alternative is established, we are suggesting that callers wishing to use the branding feature continue to use the original toll-free number.

Well, the numbers are now in and the results are remarkable. Voice initiated calls are up on average of 20% a month since 7-1-1 was implemented seven months ago. These new numbers are in comparison to the number of voice calls initiated during the same month of 1998. Data, as well as customer feedback tells us that callbacks by voice callers have increased dramatically. In addition, overall call volume is up 10% since 7-1-1 began, this compared to several years of only 2-3% growth. On Average 44% of all callers accessing relay are using 7-1-1.

In July 1999, over 47% of all calls to Maryland Relay were initiated through 7-1-1. We expect these numbers to continue to grow. Another benefit of 7-1-1 being answered in voice first is that calls from voice callers receiving tones when calling the relay are now almost non-existent.

Bell Atlantic has made both their pay phones and cellular phone service 7-1-1 accessible. We have contacted both pay phone providers and cellular companies, requesting that they make their systems accessible, however, since it is not yet an FCC requirement, very few have complied.

II. Methods to Educate and Provide Technical Assistance to the Public about 7-1-1 Access to TRS.

At this time I would like to say a few words on "Methods to Educate and Provide Technical Assistance to the Public about 7-1-1 access to TRS, including airing Public Service Announcements." It's called many names, including "Information and Referral", "Outreach" and also "Advertising and Public Relations." Maryland has always believed that providing information about TRS to the public is critical to its long-term success. In fact, we are so strongly committed to that idea that we have included a specific dollar amount within our TRS contract dedicated solely to educate the public. We knew that we did not have the in-house expertise to disseminate the word about TRS in a cost-effective manner which is why we included this requirement in our contract. The contracted Advertising/Public Relations team put in place a comprehensive program to effectively get the word out about 7-1-1.

Advertising is the part of the plan that costs you money; public relations are an endorsement by a third party such as a newspaper or TV reporter.

Our comprehensive outreach program began on February 8th, 1999 with a press conference that was held at the Maryland Relay center in Baltimore. This press conference was held jointly with Bell Atlantic, the State of Maryland, and Sprint, our TRS provider. In attendance were members of the Maryland Public Service Commission, Bell Atlantic, State Government, the FCC, our Governor's Advisory Board for Telecommunications Relay and members of the general public. Key to the success of this kick-off was attendance by the media. Our public relations firm was able to entice four television stations, three radio stations, several newspapers, and the Associated Press to attend. From this single event, we generated a significant amount of coverage. But we didn't stop there.

The same day of the press conference, paid television advertising began. We ran five weeks of advertising in the two major television markets in Baltimore and the Washington metropolitan area. To save money we ran spots on only one TV station in each market. For those states that have television markets that border two or more states, I strongly suggest that you consider joint advertising. TV advertising is effective, but expensive. We opted not to depend on the television stations airing free public service announcements. We have submitted PSA's to television stations in the past, and had minimal airtimes. Those that were aired were done so at three and four o'clock in the morning. The 30 second 7-1-1 television spot was actually the second television spot we ran within the past year. The first spot was a generic relay spot. The second spot, which announced 7-1-1, was directly linked to the first ad.

The second week in February 1999, we also began paid print advertising in the two major newspaper markets in Maryland. The ad "*It's not the name of a popular convenience store, though its convenient,...*" ran in both the Baltimore Sunpapers and the Washington Post.

In addition, we wanted to ensure that TTY users did not confuse 7-1-1 with 9-1-1. We always tell consumers to call 9-1-1 in an emergency, never the relay. We wanted to make sure there was no

confusion. We ran the TTY-oriented ad in six deaf publications both locally and nationally hoping to hit as many Maryland Relay users as possible.

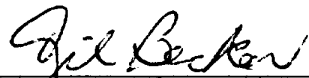
Bell Atlantic provided a telephone bill insert which was distributed to almost 2.5 million telephone subscribers. The bill insert reads "*Did you know Maryland Relay is now even easier to use; Now to use Maryland Relay from anywhere inside the State, dial 7-1-1.*" This is the third bill insert we have mailed to telephone subscribers since we began providing TRS in 1991. Bill inserts are an extremely effective tool to disseminate information. Since the initial 7-1-1 mailing in February, we still continue to get calls requesting information, with customers referring to that bill insert. Bell Atlantic provided the bill insert at no cost to the state, saving the State almost \$65,000 in printing and postage.

More than a dozen newspapers and magazines articles have been written about 7-1-1, greatly increasing our exposure to the general population. We also publish a newsletter twice a year which gets the word out as well.

Finally, we provide a toll-free customer service number which provides information, and technical assistance to individuals requesting information. On an average month, we receive between 500 and 600 inquiries to our customer service number. During the month of February we doubled that number, receiving almost 1200 calls.

In total we have spent almost \$100,000 on outreach. Well worth it, considering the results that clearly demonstrate the effectiveness of our campaign.

Respectfully Submitted,





Gil Becker, Director
Maryland Relay

7-1-1

Three Digit Abbreviated Dialing

Gil Becker
Maryland Department of
Budget & Management





Before 7-1-1

1-800-735-2258
Customer Profile/Branding
Voice, TTY, ASCII, VCO


1-800-785-5630
Speech to Speech

1-900-386-3323
900 Pay per Call



Issues with One Ten-Digit Toll Free Number for Voice, TTY, ASCII and VCO

- Problems with PBX's
- Problems with Multi-user Households
- Minimal Call-backs
- Difficult to Explain/publicize




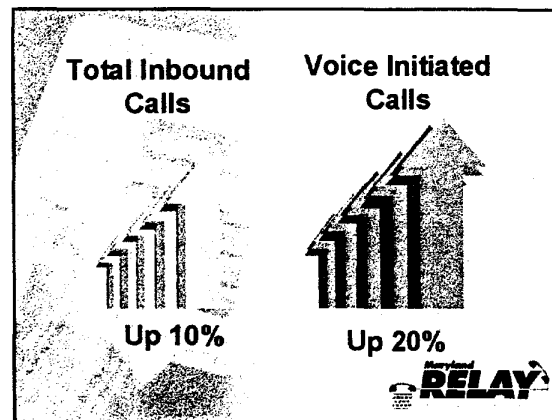
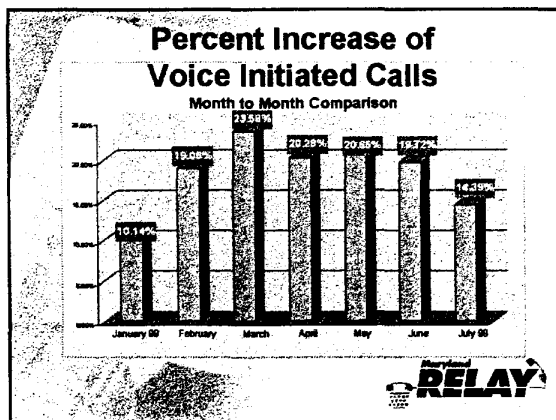
After 7-1-1

7-1-1
IGNORES Customer Profile/Branding
Voice, TTY, ASCII, VCO

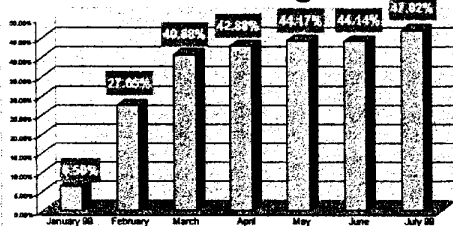
1-800-735-2258
Customer Profile/Branding
Voice, TTY, ASCII, VCO

1-800-785-5630
Speech to Speech

1-900-386-3323
900 Pay per Call

Percent of Calls Handled Through 7-1-1



**In July 1999
7-1-1 Handled
47% of Total
Incoming Call Volume**



Ongoing Issues

- 7-1-1 Always Answers Voice First
- Branded Callers, VCO Users Should Use 1-800-735-2258
- Pay Phones
- Cellular Phones




**Methods to
Educate and Provide
Technical Assistance to
the Public**



Advertising & Public Relations

- Press Conference
- Television Advertising
 - Five weeks in two major markets
- Print Advertising






It's not the name of a popular convenience store,
though it's very convenient.

It's not the time, or even a calendar date,
though it's available around the clock, every day.

It's the Maryland Relay service, a toll-free telephone service for the hearing and speech impaired.


Print Ad

The Baltimore Sun
The Washington Post




You can rely on Maryland Relay.
Now, we're even easier to use.


Dial 7-1-1 for



Dial 7-1-1 to
use Maryland Relay
in Maryland
1-800-735-7258




**Print Ad
Appearing in
Deaf
Publications**



**Advertising &
Public Relations**

- Press Conference
- Television Advertising
– Five weeks in two major markets
- Print Advertising
- Phone Bill Insert



Did you know
Maryland Relay
is now even
easier to use?



**Phone Bill
Insert**



Now, to use Maryland Relay from anywhere
inside the State, dial 7-1-1



Newspaper Clippings


Text-phone access
now as easy as 7-1-1

How Phone No. For Hearing, Speech Impaired

**Advertising &
Public Relations**

- Press Conference
- Television Advertising
– Five weeks in two major markets
- Print Advertising
- Phone Bill Insert
- Newsletter
- Technical Assistance Toll-Free Number



Maryland Relay
Customer Service
1-800-552-7724

Maryland
RELAY

Maryland
RELAY